

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
-----X
UNITED STATES OF AMERICA :

- V - :

SUREN GADAYEV :

Defendant. :
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NOTICE OF MOTION

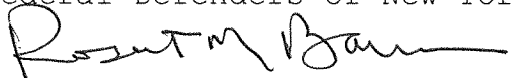
15 Cr. 66 (LTS)

PLEASE TAKE NOTICE that upon the annexed affirmation of **ROBERT M. BAUM, ESQ.**, and the exhibits attached thereto, the defendant herein, **SUREN GADAYEV**, will move before the **HONORABLE LAURA TAYLOR SWAIN**, United States District Judge for the Southern District of New York, at the United States Courthouse located at 500 Pearl Street, New York, New York, on July 17, 2015, for an Order, pursuant to the Fifth and Sixth Amendment to the United States Constitution; Rule 12(b)(3) and Rule 14, of the Federal Rules of Criminal Procedure, suppressing statements and granting a severance between defendants, and such other relief as the Court may deem just and proper.

Dated: New York, New York
May 15, 2015

Respectfully submitted,
DAVID E. PATTON, ESQ.
Federal Defenders of New York

By:



ROBERT M. BAUM, ESQ.

Assistant Federal Defender
Attorney for Defendant

SUREN GADAYEV

52 Duane Street - 10th Floor
New York, New York 10007

TO: PREET BHARARA, ESQ.
United States Attorney

Southern District of New York
One St. Andrew's Plaza
New York, New York 10007
Attn: **RUSSELL CAPONE, ESQ.**
Assistant United States Attorney